

The Brixton Society

Understanding the Past, Looking to the Future

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Lambeth Planning,
(Development Management)
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For the attention of Ms Maylinne Nasa

15th August 2022

Dear Ms Nasa

Creation of a Community Football Pitch, Brockwell Park, Planning Ref 22/02374/RG3

I write on behalf of the Brixton Society.

We agree that there is a need for more and better outdoor sports facilities in Lambeth, particularly facilities available for use by children and young people. We note that the proposed site occupies a part of the park which is already designated for sport, including a disused football pitch and that funding offered by the Football Foundation provides an opportunity to extend and upgrade this pitch and bring it back into use. For both of these reasons, we accept that in principle there are good arguments for this proposal.

However, we feel that it is essential that further information about the impact of the scheme is provided by the applicants before it can be properly assessed. We think that the Council should defer any decision on the application until this information is made available. In addition, if an application were to be approved, this should be subject to planning conditions which would help to lessen its impact and to ensure that the local community benefits.

For clarity, in the absence of essential information about the design of the floodlights and the impact that the scheme is likely to have on Brockwell Park, the Brixton Society neither supports or objects to this application.

1. Additional information needed before the application is decided

We have concerns about the impact that the scheme, including particularly the proposed 12 metre high floodlight columns, is likely to have on Brockwell Park, which is both a Conservation Area and an area of great natural diversity.

We do not consider that the issue of the impact of the proposals on the park is dealt with adequately in the Design and Access Statement or in any other of the supporting documents provided by the applicants and we would like to see further documentation produced and made available to the public before the application is decided.

This further documentation should include

- a) More detail on how the positioning and design of the proposed floodlights will minimise the potential for light to spill over into other parts of the Park, including consideration of how the led units will direct light onto the pitch surface and away from surrounding trees and foliage, information about the hoods and shutters that will be used to minimise the spillage of light into the park and a discussion of whether adequate lighting of the pitch could be achieved with columns lower than 12 metres were the flood lights to directed onto the pitch surface rather than downwards onto the perimeter fence. (We note that the only images provided of the proposed floodlights appear to show floodlights positioned on the top

of the columns, facing downwards on the perimeter fence rather angled towards the pitch surface and with no hoods or shutters to minimise light spillage away from the pitch).

- b) An assessment of the extent to which light from the proposed floodlights will spill over and illuminate other parts of the park at dusk and at night – how much of the park will be affected and what will the impact be
- c) An assessment of how the of spill over of illumination from the floodlight to other areas within the park is likely to impact on wildlife, including nesting birds, bats and insects
- d) An assessment of how the floodlighting of the pitch and surrounding areas within the park will impact on views of the park enjoyed by park visitors at dusk– for example on views across the park to the north and the London skyline beyond that can be enjoyed by people standing on the plateau outside Brockwell Hall
- e) A Conservation Area Assessment. The Design and Access Statement states that the site is not within a Conservation Area. This is incorrect, The Brockwell Park Conservation Area includes the whole of the park (including the application site) and a CAA should be provided by the applicants. We also note that Historic England are not included in the list of consultees for this application as required for applications for sites within Conservation Areas and this omission should be rectified.

2. Planning conditions required if an application is approved

- a) Agreement that use of the pitch and the floodlights will be from dusk until 9 pm only. We note that the Planning Statement indicates that the pitch will be in use until 10 pm daily. We think there are strong arguments for an earlier closing time, 9 pm rather than 10 pm. Firstly, it would mean that users of the Football Pitch and the Brockwell Lido (which closes at 9 pm) would leave at the same time. As users of the Football Pitch and the Lido will use the same entrance and exit gate after dusk (all the remaining gates into the park close at dusk) it would help ensure the security of the park after dark if the Pitch and Lido opening and closing hours were aligned. Secondly, during the summer months (June to August) when dusk is around 9 pm or later, there would be no need for the floodlighting to be turned on at all as the pitches would enjoy natural light throughout the time when they are in use. The effect would be to minimise the impact of the floodlighting on nesting birds, bats and flying insects during the summer months when they are most active.
- b) Agreement the floodlights will only operate when there is a booking and will be turned off at other times. This will avoid unnecessary impact on wildlife by providing longer dark periods as well as reduce energy costs.
- c) Planning to be subject to a Community Use Agreement, to be negotiated with representatives of local community organisations providing sports activities to children and young people, which would set out the hours when schools, local community organisations and charities would have priority access to the pitch and the details of the booking arrangements discounted hire fees that would be offered to community organisations.

Yours sincerely


For the Brixton Society